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7 Attorneys for Defendants EDRIVER, INC., ONLINE
8 GURU INC., FIND MY SPECIALIST, INC.,
9 SERIOUSNET, INC., RAVI K. LAHOTI, RAJ LAHOTI

10 **UNITED STATES DISTRICT COURT**

CENTRAL DISTRICT OF CALIFORNIA

11 TRAFFICSCHOOL.COM, INC., a
California Corporation; DRIVERS ED
12 DIRECT, LLC, a California limited
liability company,

13 Plaintiffs,

14 v.

15 EDRIVER, INC., ONLINE GURU,
16 INC., FIND MY SPECIALIST, INC.,
and SERIOUSNET, INC., California
17 corporations, RAVI K. LAHOTI, an
individual; RAJ LAHOTI, an individual;
18 DOES 1 through 10,

19 Defendants.

Case No: CV 06-7561 PA (CWx)

**SUPPLEMENTAL DECLARATION
OF ANDREW SERWIN IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES**

Date: December 5, 2011

Time: 1:30 p.m.

Ctrm: 15

Judge: Honorable Percy Anderson

Complaint Filed: November 28, 2006

20 I, Andrew Serwin, declare:

21 1. I am an attorney licensed to practice before all courts in the State of
22 California and before this Court. I am a partner at the law firm of Foley & Lardner
23 LLP, counsel of record for EDriver, Inc., Online Guru Inc., Find My Specialist,
24 Inc., Seriousnet, Inc., Ravi K. Lahoti, and Raj Lahoti, Defendants in this matter. I
25 have personal knowledge of the facts set forth herein and, if called upon to testify,
26 could and would competently testify thereto.

27 2. On November 3, 2011, Plaintiffs submitted my Declaration in Support
28

1 of Defendants' Comments to Joint Statement On Plaintiffs' Motion for Attorneys'
2 Fees together with Defendants' Comments to Joint Statement.

3 3. Concurrent with the filing, Plaintiffs also submitted declarations of
4 Mina Hamilton. I have reviewed her declarations and specifically her recollection
5 of my conversations with her.

6 4. I take issue with the statements of Ms. Hamilton and Ms. Brosas
7 summarizing what I allegedly said during the meet and confer process. Defendants
8 position is clearly laid out in the written documents timely submitted to Plaintiffs
9 counsel as required by the Court's August 24, 2011 order and are on file with this
10 Court, including Doc. No. 317.

11 I declare under penalty of perjury under the laws of the State of California
12 that the foregoing is true and correct and that I executed this declaration on
13 November 14, 2011, at San Diego, California.

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15 /s/ Andrew Serwin
16 Andrew Serwin
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